IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA DANVILLE DIVISION

UNITED STATES OF AMERICA,

v. Case No. 4:18CR00017

TYRONE YOUNG

MOTION TO WITHDRAW AS COUNSEL FOR TYRONE YOUNG

The Federal Public Defender hereby moves to withdraw as counsel for Tyrone Young due to

a conflict with representation of another client.

1. Defendant Young stands charged with various fraud charges based on allegations that

he and others fraudulently obtained money from the United States Department of

Education and used other people's identities to effect the fraud, in violation of 18 USC

Sections 1343 and 1028A and 20 USC Section 1097(a). The court appointed the

Federal Public Defender to represent Mr. Young on June 7, 2018.

2. Following appointment, the Federal Public Defender has learned of a conflict involving

another client (previously appointed) which precludes representing both.

Wherefore, the Federal Public Defender moves that he be released from representing Mr.

Young and that new counsel be appointed to represent Mr. Young.

Respectfully submitted,

Tyrone Young

By: /s/ Randy V. Cargill

Of Counsel

Randy V. Cargill, Esquire Assistant Federal Public Defender Office of the Federal Public Defender 210 1st Street, Suite 400 Roanoke, Virginia 24011 (540) 777-0880 FAX: (540) 777-0890

Counsel for Defendant Tyrone Young

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of August 2018, I served the foregoing Motion to Withdraw as Counsel upon Kari Munro, Assistant United States Attorney, P.O. Box 1709, Roanoke, VA 24008-1709 by electronic filing and I caused the original thereof to be filed electronically with Julia Dudley, Clerk, United States District Court, 210 Franklin Road, S.W. Roanoke, VA 24011.

By: <u>/s/Randy V. Cargill</u>
Randy V. Cargill